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Attorneys for Defendant/Counterclaim-Plaintiff  
Fieldturf USA, Inc., and Defendant Fieldturf Tarkett  
USA Holdings, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**FIELD TURF BUILDERS, LLC**, an Oregon  
limited liability company; **MARK RYAN**,

CV No.: CV 09 671 HZ

Plaintiffs,

vs.

**STIPULATED MOTION TO EXTEND  
DEADLINES FOR DISPOSITIVE  
MOTION RESPONSES AND REPLIES**

**FIELDTURF USA, INC.**, a Florida  
corporation; **FIELDTURF TARKETT USA  
HOLDINGS, INC.**, a foreign corporation;  
**JOE FIELDS; MICHAEL MCNEIL**,

Defendants.

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**FIELDTURF USA, INC.**, a Florida  
Corporation,

Counterclaim-Plaintiff,

vs.

**CRYSTAL RYAN, BOECKMAN  
PROPERTIES, LLC**, an Oregon limited  
liability company, and **GULF PACIFIC  
CO.**, an Oregon corporation,

Additional Counterclaim-Defendants.

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The parties jointly move the Court for an extension of time pursuant to this Stipulated Motion to Extend Dispositive Motion Response and Reply Deadlines.

The parties request that the deadlines for responses and replies to the pending cross motions for summary judgment be extended as described below:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Responses to dispositive motions	July 15, 2011	July 22, 2011
Replies to dispositive motions	July 29, 2011	August 5, 2011

The parties propose that the remaining dates remain as currently scheduled:

<b>Event</b>	<b>Current Deadline</b>
Tentative date for oral argument on dispositive motions	August 15, 2011
Expert disclosures	Within 30 days of ruling on dispositive motions
Rebuttals to expert disclosures	30 days after expert disclosures
Close of expert discovery	Within 30 days after rebuttals
Pretrial order	14 days before commencement of trial

DATED this 7th day of July, 2011.

MARKOWITZ, HERBOLD, GLADE  
& MEHLHAF, P.C.

GREENE & MARKLEY, P.C.

By: /s/ Stacy R. Owen

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Of Attorneys for  
Defendant/Counterclaim-Plaintiff  
Fieldturf USA, Inc., and Defendant  
Fieldturf Tarkett USA Holdings, Inc.

By: /s/ Sean C. Currie

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Of Attorneys for Plaintiffs/Counterclaim-  
Defendants Field Turf Builders, LLC and  
Mark Ryan and additional Counterclaim-  
Defendants Crystal Ryan, Boeckman  
Properties, LLC and Gulf Pacific

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**ATTORNEY CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2011, I have made service of the foregoing  
**STIPULATED MOTION TO EXTEND DEADLINES FOR DISPOSITIVE MOTION  
RESPONSES AND REPLIES** on the party/ies listed below in the manner indicated:

S. Ward Greene  
Charles R. Markley  
Sean Currie  
Greene & Markley, P.C.  
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Portland, OR 97201

☐ U.S. Mail  
☐ Facsimile  
☐ Hand Delivery  
☐ Overnight Courier  
☐ Email  
☒ Electronically via USDC CM/ECF system

Bonnie M. Richardson  
Folawn Alterman & Richardson LLP  
805 SW Broadway, Suite 2750  
Portland, OR 97205

DATED this 7th day of July, 2011.

*/s/ Stacy R. Owen*

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Stacy R. Owen, OSB #074826  
Defendant/Counterclaim-Plaintiff Fieldturf USA  
Inc., and Defendant Fieldturf Tarkett USA  
Holdings, Inc.

**CERTIFICATE OF SERVICE**